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7 Attorneys for Defendant  
Paramount Global, f/k/a ViacomCBS Inc.,  
8 f/k/a CBS Corporation, a Delaware  
corporation, f/k/a Viacom Inc., successor  
9 by merger to CBS Corporation, a  
Pennsylvania corporation, f/k/a  
10 Westinghouse Electric Corporation

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 SCOTT L. HULTNER and  
15 GERALDINE E. HULTNER,

16 Plaintiffs,

17 vs.

18 AIR & LIQUID SYSTEMS  
CORPORATION (*sued individually*  
19 *and as successor-in-interest to*  
BUFFALO PUMPS, INC.,) et al.,

20 Defendants.  
21  
22  
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Case No: 8:24-cv-00409-JLS (DFMx)

**DECLARATION OF JUSTIN F. CRONIN  
IN SUPPORT OF DEFENDANT  
PARAMOUNT GLOBAL'S OPPOSITION  
TO PLAINTIFFS' OMNIBUS MOTION  
FOR PARTIAL SUMMARY JUDGMENT  
AS TO DEFENDANTS' AFFIRMATIVE  
DEFENSES**

Hearing Date: May 2, 2025  
Hearing Time: 10:30 a.m.  
Judge: Hon. Josephine L. Staton  
Location: Courtroom 8A, 8<sup>th</sup> Floor

Complaint Filed: February 27, 2024  
Pre-Trial Conf.: August 22, 2025

1 I, JUSTIN F. CRONIN, declare:

2 1. I am an attorney at law duly licensed by and in good standing with the  
3 State Bar of California. I am admitted to practice before all of the Courts of the State  
4 of California and the United States District Court for the Central, Southern, Northern,  
5 and Eastern Districts of California. I am a partner in the law firm of Jamison Empting  
6 Cronin LLP, the attorneys of record for Defendant Paramount Global, f/k/a  
7 ViacomCBS Inc., f/k/a CBS Corporation, a Delaware corporation, f/k/a Viacom Inc.,  
8 successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a  
9 Westinghouse Electric Corporation (“Westinghouse”).

10 2. I have participated in this litigation and have reviewed all of the  
11 pleadings, discovery, and documents produced in this litigation. Except as to those  
12 matters stated upon information and belief, as to which I am informed and believe to  
13 be true, I have personal knowledge of the facts set forth herein or have gained such  
14 knowledge from my review of the records and documents maintained in our file in the  
15 regular course of business. If called as a witness, I could and would competently  
16 testify to the matters stated herein.

17 3. Attached hereto as **Exhibit A** are true and correct copies of excerpts from  
18 Volume 2 of the deposition of Plaintiff Scott L. Hultner, taken in this matter on  
19 August 13, 2024.

20 4. Attached hereto as **Exhibit B** are true and correct copies of excerpts from  
21 Volume 1 of the deposition of Plaintiff Scott L. Hultner, taken in this matter on  
22 August 5, 2024.

23 5. Attached hereto as **Exhibit C** are true and correct copies of excerpts from  
24 Volume 6 of the deposition of Plaintiff Scott L. Hultner, taken in this matter on  
25 August 21, 2024.

26 6. Attached hereto as **Exhibit D** are true and correct copies of excerpts from  
27 Volume 4 of the deposition of Plaintiff Scott L. Hultner, taken in this matter on  
28 August 19, 2024.

1           7. Attached hereto as **Exhibit E** are true and correct copies of relevant  
2 pages from NAVSHIPS 0904-003401010, Preliminary Index of Technical  
3 Publications, *USS John Adams* – SSB(N) 620, dated March 1969.

4           8. Attached hereto as **Exhibit F** is a true and correct copy of the January 13,  
5 2000, Declaration of Michael T. Sweeney made in support of Defendant CBS  
6 Corporation's Contention that Westinghouse Air Brake Corporation is a Separate  
7 Entity for Which CBS Has No Liability in the matter of *Ruby Fong, et al. v. Owens-*  
8 *Corning, et al.* (Alameda County Superior Court Case No. 801450-0).

9           9. Attached hereto as **Exhibit G** is a true and correct copy of Westinghouse  
10 Air Brake Division's Answers and Responses to Plaintiffs' Interrogatories and  
11 Request for Production of Documents (Set 1) made in the matter entitled *In re*  
12 *Minnesota Personal Injury Asbestos Cases* (Ramsey County District Court, Second  
13 Judicial District Court File No. C8-94-2875).

14           10. Attached hereto as **Exhibit H** are true and correct copies of excerpts from  
15 Volume 1 of the deposition of third-party witness Dale Armbrister, taken in this  
16 matter on December 9, 2024.

17           11. Attached hereto as **Exhibit I** are true and correct copies of excerpts from  
18 Volume 2 of the deposition of third-party witness Dale Armbrister, taken in this  
19 matter on December 16, 2024.

20           12. Attached hereto as **Exhibit J** is a true and correct copy of the Affidavit of  
21 Rear Admiral John B. Padgett, III (U.S.N., Ret.), signed under penalty of perjury on  
22 March 25, 2025.

23           13. Attached hereto as **Exhibit K** are true and correct copies of excerpts from  
24 the deposition of expert witness Arnold Moore, taken in the matter of *David J. Skudin*  
25 *v. Air & Liquid Systems Corp., et al.* before the United States District Court of  
26 Hawaii, Civil No. CV-2200425 SASP-RT on March 14, 2025.

27           14. Attached hereto as **Exhibit L** is a true and correct copy of the Report of  
28 Samuel A. Forman, M.D., signed under penalty of perjury on March 27, 2025.

15. Attached hereto as **Exhibit M** are true and correct copies of excerpts from the deposition of expert witness Candace Su-Jung Tsai, C.I.H., taken in the matter of *David J. Skudin v. Air & Liquid Systems Corp., et al.* before the United States District Court of Hawaii, Civil No. CV-2200425 SASP-RT on March 12, 2025.

16. Attached hereto as **Exhibit N** are true and correct copies of excerpts from the deposition of Westinghouse Corporate Witness Leo Romer, taken in the matter of *Bernice Tuck v. Owens Corning Fiberglass Corp., et al.* before the District Court of the Sixth Judicial District of the State of Idaho, in and for the County of Bannock, Civil Action No. 41528-C, Case No. 3695 on July 21, 1993.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 11th day of April 2025, at Los Angeles, California.

/s/ Justin F. Cronin  
JUSTIN F. CRONIN, Declarant

**CERTIFICATE OF SERVICE**

I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 825 East Fourth Street, Suite 204, Los Angeles, CA 90013.

On April 11, 2025, I served the following document(s): **DECLARATION OF JUSTIN F. CRONIN IN SUPPORT OF DEFENDANT PARAMOUNT GLOBAL'S OPPOSITION TO PLAINTIFFS' OMNIBUS MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO DEFENDANTS' AFFIRMATIVE DEFENSES** on the interested parties in this action by placing a true and correct copy of such document, enclosed in a sealed envelope, addressed as follows:

FROST LAW FIRM, PC  
273 West 7<sup>th</sup> Street,  
San Pedro, CA 90731  
T: 866-353-6373  
F 310-361-8803

THE LAW OFFICES OF WORTHINGTON & CARON,  
PC  
273 West 7<sup>th</sup> Street  
San Pedro, California 90731  
T 310-221-8090  
F 310-221-8095

*Attorney for Plaintiffs*

And All Parties Registered to receive electronic notification on this matter

☐ I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date in the United States mail at, Los Angeles, California.

☒ By E-Service: I electronically served the above document(s) via PACER CM/ECF and/or File & ServeXpress on the recipients as registered and designated to receive electronic notification.

☐ By Personal Service: I caused to be delivered by courier **Nationwide Legal Express**, such envelope by hand to the offices of the above addressee(s).

Executed: April 11, 2025

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

James Choi  
James Choi

4810.0870

DECLARATION OF JUSTIN F. CRONIN ISO PARAMOUNT GLOBAL'S  
OPPOSITION TO PLAINTIFFS' OMNIBUS MOTION FOR PARTIAL SUMMARY  
JUDGMENT